

Federal Communications Commission
Washington, D.C.

Subject: *Petition for Rule Making* (RM-10870) by the National Conference of
Volunteer Examiner Coordinators

Dear Commissioners:

I have been an amateur radio operator since 1968, an Amateur Extra class licensee since 1970, and a volunteer examiner since 1984. My early interest in amateur radio motivated me, as it has many other licensees, to pursue a career in electrical engineering. I very much want the Amateur Radio Service to remain a vibrant institution consisting of “trained operators, technicians, and electronics experts” as stated in Part 97.1 of the Commission’s regulations.

In its petition (RM-10870) the National Conference of Volunteer Examiner Coordinators (NCVEC) recommends sweeping changes to the Amateur Radio Service, including the removal of Morse code testing for all classes of license. I urge the Commission to reject this petition.

An entry-level license with no Morse code testing requirement, but conveying some modest HF privileges (including radiotelephony), may provide a viable path to attract new licensees into the Amateur Radio Service. However, there is no need to create a new entry-level license as recommended by RM-10870. A much better approach is to simply modify the present Technician class license (the current entry-level license) as proposed in petition RM-10868 filed by the Radio Amateur Foundation. In addition, the Morse code test currently required for all General and Amateur Extra class applicants should be retained.

The entry-level licensee will have ample opportunities to gain on-the-air proficiency with Morse code if he or she so chooses. As before with the Novice and Technician classes, some of these entry-level licensees will be content to operate within their limited privileges and will never seek a higher class of license. However, the growth of the Amateur Radio Service will not be unduly hampered if the minimal Morse code examination currently required for General and Amateur Extra class applicants is retained.

No one having a modicum of motivation for increased operating privileges will suffer a significant hardship in satisfying the 5 WPM Morse testing requirement as currently required for all General and Amateur Extra class applicants. Morse is a special mode unlike any other; those amateurs with at least a minimum proficiency in radiotelegraphy have a distinct advantage over amateurs with no code proficiency whatsoever.

I have spent a major part of my operating time on HF public service nets that focus on the transmission of formal messages. These so-called traffic nets offer

amateur radio operators significant training opportunities in emergency communications. I operate on both SSB and Morse code nets; many times I have directly experienced the tremendous advantage of radiotelegraphy over radiotelephony under less-than-optimum propagation conditions. Relatively simple equipment operating at low power levels will almost always get the message through in a timely manner when using the code; no other mode has this unique capability. Thus, a minimum proficiency in Morse code should remain a basic skill possessed by all General and Amateur Extra class operators because of the continuing importance of amateur radio in providing backup emergency communications to governments at the local, state, and national levels, along with served agencies such as the American Red Cross and the Salvation Army.

When I started studying for my first amateur license, I was sure that I would operate radiotelephony exclusively once I had passed the required Morse tests. After I passed the 5 WPM test and used the code on the air for a short time, I began to understand its unique qualities. Although I operate phone and several digital modes, telegraphy has always been my principal mode. It's not until one has learned Morse and actually used it to communicate that he values its uniqueness. I believe that if the Morse code test is eliminated for all classes of amateur license, a large majority of the new licensees will never have sufficient motivation to learn the code.

It is generally accepted that students are not capable of determining the particular academic topics that should and should not be included in a specific discipline. As a college teacher, I firmly believe in this principle. As an experienced amateur radio operator, I believe this principle also applies in this debate on Morse testing; that is, I submit that applicants with no experience in radiotelegraphy are in no position to argue that General and Amateur Extra class operators should be excused from demonstrating code proficiency. Moreover, I have no doubt that most of the comments received by the Commission in favor of this petition will be from individuals with no experience in radiotelegraphy.

Operating an amateur radio station is a privilege earned through examination of an applicant's qualifications. The quality of the Amateur Radio Service is more important than its number of licensees. These basic principles will be better served if the current 5 WPM Morse examinations are retained for both the General and Amateur Extra class licenses.

In conclusion, I again urge the Commission to reject this petition.

Very truly yours,

Mickey D. Cox K5MC
754 Cheniere-Drew Road
West Monroe, LA 71291